

MAY 07 2014

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

David J. Bradley, Clerk of Court

IN RE: RAY ROSA,
Debtor

§ Case No. 13-37731
Chapter 7

MICHELLE SCOTT and BILL DEMBSKI,
Plaintiffs

v.

§ Adversary No. 14-03090

RAY ROSA,
Defendant

ANSWER TO COMPLAINT TO DETERMINE NON-DISCHARGEABILITY OF DEBT

Defendant, Ray Rosa, answers the complaint for non dischargeability of debt filed by Plaintiffs, Michelle Scott and Bill Dembski as follows:

I.,1-2 Defendant admits that Michelle Scott and Bill Dembski reside in Houston Tx.

I. 3 Defendant denies to be a resident in Harris County as he is a resident of Fort Bend County.

II.4 Defendant admits that this adversary proceeding is under Chapter 7 of Title 11, however the case was dismissed.

III,5. Defendant denies allegations and statements declared as facts. It was made clear to the Plaintiffs from the Defendant that Dr Charles made representations about how funds would be distributed once the business was operating at the hospital. This was in there own tape recorded conversation. The partners contribution was a calculation from the Elara Healthcare Attorney Jess Bailey not the Defendant. The information requested from the Plaintiffs were given to them. The Plaintiffs would tape record conversations trying to entrap the Defendant by manipulating facts in addition to starting and stopping a conversation being recorded at a meeting. All attempts to secure a contract for Hyperbaric Medicine and Wound Care Services were conveyed to the Plaintiffs with no distortion of facts.

III, 6. Defendant denies allegations and statements declared as facts. There was no corporate web that the Defendant used to funnel monies through as there was only one bank account for the company with all debits and deposits accounted for. The other entities of Elara Healthcare did not have a bank account and no checks were payable to such organization. The monies of the company covered salary costs, medical insurance, attorney fees, chamber costs, travel for prospects just to name a few. A detail of the expenses was given to the Plaintiffs. The Plaintiffs allege that they never heard of Elara Healthcare but wrote a check payable to Elara Healthcare. The Plaintiffs attorney would like the court to believe that the various entities setup were part of a elaborate scheme and have provided no such documentation in state court that would prove such a claim. The Defendant

will seek sanctions against Mr Daniel Nelson attorney for Plaintiffs under Rule 9011 for assertions of facts without sufficient evidence to support.

IV, 7,8,9,10, 11, 12, 13, 14, 15, 16. Defendant denies allegations in Section 4 numbers 7-16.

IV, 17,18,19. Defendant denies statements made in Section 4 numbers 17,18, and 19 as the Plaintiffs have been given financial records .

IV, 20. Defendant denies Plaintiffs are entitled to attorneys fees.

**By: Ray Rosa
Pro Se**



CERTIFICATE OF SERVICE

I, RAY ROSA (name), certify that service of this summons ^{with answers} ~~and a copy of~~
to the complaint was made 7 MAY 14 (date) by:

- ☐ Mail service: Regular, first class United States mail, postage fully pre-paid, addressed to:
- ☒ Personal Service: By leaving the process with the ^{plaintiff attorney} ~~defendant or with an officer or agent of defendant at:~~
- ☐ Residence Service: By leaving the process with the following adult at:
- ☐ Certified Mail Service on an Insured Depository Institution: By sending the process by certified mail addressed to the following officer of the defendant at:
- ☐ Publication: The defendant was served as follows: [Describe briefly]
- ☐ State Law: The defendant was served pursuant to the laws of the State of _____, as follows: [Describe briefly]

If service was made by personal service, by residence service, or pursuant to state law, further certify that I am, and at all times during the service of process was, not less than 18 years of age and not a party to the matter concerning which service of process was made.

Under penalty of perjury, I declare that the foregoing is true and correct.

Date 7 May 14

Signature 

Print Name: RAY ROSA

Business Address:

25818 orchard knoll Ln
Katy Tx 77494